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	ELECTRONICALLY FILED
	DOC #:
December 5, 2019	DATE FILED: 12/5/19

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*Extension granted to
12/12/19 at 4:30 pm.*

VIA ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

SO ORDERED:

Date: 12/5/19

Richard M. Berman
Richard M. Berman, U.S.D.J.

Re: United States v. Ramses Owens, et al., 18 CR. 693 (RMB)

Dear Judge Berman:

We represent Richard Gaffey in the above-referenced matter. On behalf of both Mr. Gaffey and his co-defendant, Johan von der Goltz, we are writing to respectfully request a one-week adjournment of the date on which the joint jury charge and voir dire must be filed. The jury charge is currently scheduled to be filed on Monday, December 9, 2019. We are therefore respectfully requesting an adjournment until Monday, December 16, 2019. This is the defendants' first request for such an adjournment. We have conferred with the government, which has consented to this request.

The charges in this case are complex, including allegations of a long-term tax evasion conspiracy involving a number of complicated legal issues. The jury charge that the defense recently received from the government was 80 pages long, with nearly 50 separate jury instructions. With in limine motions also due to be filed on December 9, the defense will need additional time to review the charge provided by the government and to then confer with the government concerning the position of the defendants. This adjournment will not impact the schedule for trial, which is scheduled to begin on January 13, 2020.

Accordingly, the defendants respectfully request that the date on which the jury charge and voir dire must be submitted is adjourned to December 16, 2019.

Respectfully submitted,

Robert B. Buehler
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cc: Counsel of Record